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THE HONORABLE MARSHA J. PECHMAN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

IN RE: WASHINGTON MUTUAL
MORTGAGE BACKED SECURITIES
LITIGATION,

This Document Relates to: ALL CASES

Master Case No. 2:09-cv-00037-MJP

**DECLARATION OF ANNE L. BOX IN
SUPPORT OF PLAINTIFFS'
EXPEDITED MOTION TO AMEND
SCHEDULING ORDER**

**NOTED ON MOTION CALENDAR:
December 16, 2011**

ORAL ARGUMENT REQUESTED

1 I, Anne L. Box, declare as follows:

2 1. I am an attorney with the law firm Scott+Scott LLP, counsel for Plaintiffs in this
3 matter. I make this declaration in support of Plaintiffs' Expedited Motion to Amend the
4 Scheduling Order. I have personal knowledge of the matters stated herein and, if called upon, I
5 could and would competently testify thereto.

6 2. In November 2008, the United States Senate Permanent Subcommittee on
7 Investigations initiated an investigation into some of the key causes of the 2008 financial crisis.
8 As part of the investigation, the Senate Subcommittee used WMB as a case study in its
9 examination of the events and actions that led to the 2008 financial crisis. Of the 1.5 million
10 documents produced by Defendants and JPMC in this action, many were previously produced in
11 response to Senate Subcommittee subpoenas and at least half do not pertain to this case.

12 3. On December 7 – 8, 2011, an attorney for Scott & Scott conducted an initial
13 cursory review of the loan files located in Monroe, Louisiana. I was informed there are
14 approximately 9,000 loan files and that each file contains approximately 300 – 500 pages of
15 documents for an approximate total page count of 2.7 – 4.5 million pages. Representative
16 documents contained within those files examined on December 7 – 8 include the following:
17 identification verification; employment verification; loan application; appraisal documentation;
18 credit report; loan approval report; exception documentation; income verification; and collateral
19 valuation reports.

20 4. I was informed that on September 26 – 30 and October 17 – 19, 2011, five
21 attorneys from local and Lead Counsel's firms traveled to San Francisco to review paper loan
22 files made available by Defendants and JPMC. Plaintiffs' counsel isolated approximately 12,000
23 pages, out of the hundreds of thousands reviewed, and requested copies of these documents from
24 Defendants. Despite the relatively low volume of relevant documents which Plaintiffs requested
25 be produced, Plaintiffs did not receive them until November 16, 2011.

*Decl. of Anne Box ISO Plaintiffs' Expedited Motion to
Amend Scheduling Order
Case No. C09-037-MJP*

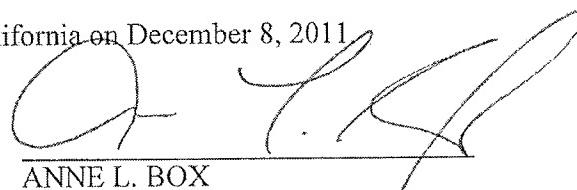
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1
2 5. Plaintiffs' counsel was informed on December 7, 2011 that Cynthia Abercrombie
could not be deposed due to having suffered a stroke.
3
4

5 6. I declare that attached to this declaration are true and correct copies of the
following exhibits:
6

- 7 Exhibit A: September 12, 2011 letter from John Pernick to Joe Guglielmo re status of
defendants' document production;
8
9 Exhibit B: October 25, 2011 email from You Jee Young to Plaintiffs' Counsel
attaching privilege log relating to WCC productions;
10
11 Exhibit C: October 26, 2011 letter from Matthew Jackson to Joshua Devore re
production of loan origination files; and
12
13 Exhibit D: Plaintiffs' Proposed Schedule.

14
15 I declare under penalty of perjury that the foregoing is true and correct, and that this
declaration was executed at San Diego, California on December 8, 2011.



16 ANNE L. BOX
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21 Facsimile: (619) 233-0508
22 abox@scott-scott.com
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24
25

*Decl. of Anne Box ISO Plaintiffs' Expedited Motion to
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CERTIFICATE OF SERVICE

I hereby certify that on December 8, 2011, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the email addresses denoted on the Electronic Mail Notice List, and I hereby certify that I caused the foregoing document or paper to be mailed via the United States Postal Service to the non-CM/ECF participants indicated on the Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on December 8, 2011.

/s/ Kim D. Stephens
Kim D. Stephens, WSBA #11984
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